

From: STEPHEN PISANO
Sent: Monday, April 10, 2006 10:24 PM
To: 'Katherine.Benham@usda.gov'
Subject: RE: NOSB Handling Committee Recommendation for the Retention of
Non-synthetic Flavors on 205.605(a)

RE: NOSB Handling Committee Recommendation for the Retention of
Non-synthetic Flavors on 205.605(a)

Citrus and Allied disagrees with the Handling Committee's
Recommendation
to retain non-synthetic flavors in Section 205.605(a) of the National
List.

We are a worldwide recognized manufacturer of ingredients and have been
supplying both the flavor and fragrance industry since 1933. Since
essential oils can be certified as organic under the NOP, and
distillation is an NOP allowed process, we have chosen to certify three
of Citrus and Allied's facilities organic and have begun to develop a
list of organic ingredients which have not previously been available to
the perfumer or flavorist.

If non-synthetic flavors are allowed to remain on 205,605a,
manufacturers will continue to use them; this defeats the purpose of
the
organic movement and creates a huge loophole which will be used and
abused! This action reduces the need for organic ingredients which
will in turn have the opposite effect on what the NOP is trying to
achieve; to maximize the number of organic ingredients available and
used, so as to maximize the acreage dedicated to organic agriculture.

If the NOP does not require that manufacturers use all of the organic
ingredients available in products labeled as "organic," there is no
motivation for the farmer or companies like ours to continue expending
the resources to manufacture those ingredients. Maintaining an
organic
certification then becomes nothing short of foolish.

We are in the process of petitioning for the inclusion of many of our
products on 205.606, and we believe that all organic compatible flavors
belong in this section, not in 205.605(a).

Many thanks,

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